

# Limerick and Clare Sports and Physical Recreation Strategy

Environmental Report June 2013
Non-Technical Summary

Prepared by Limerick Institute of Technology for Clare County Council, Limerick City Council, Limerick County Council and the Midwest Regional Authority







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#### **Abbreviations**

ACA Architectural Conservation Area

cSAC Candidate Special Area of Conservation

CSO Central Statistics Office

DoCMNR Department of Communications, Marine & Natural Resources

DoECLG Department of the Environment, Community and Local Government

EIA Environmental Impact Assessment
EPA Environmental Protection Agency

ER Environmental Report

EU European Union

GHG Green House Gas Emissions

GIS Geographical Information Systems

GSI Geological Survey of Ireland
HDA Habitats Directive Assessment

EHDA Extended Habitats Directive Assessment

IGHP Irish Geological Heritage Programme

LAP Local Area Plan

LCEA Limerick Clare Energy Agency

LCSPRS Limerick and Clare Sports and Physical Recreation Strategy

MWRA Mid West Regional Authority

MWRPG Mid West Regional Planning Guidelines

NDP National Development Plan

NGO Non Governmental Organisation

NHA Natural Heritage Area

NIAH National Inventory of Architectural Heritage

NO2 Nitrogen dioxide

NPWS National Parks and Wildlife Service

NRA National Roads Authority
NSS National Spatial Strategy
NTS Non-Technical Summary

O3 Ozone

OPW Office of Public Works

P/P Plan/Programme

pNHA Proposed Natural Heritage Area

POMS Programme of Measures

PPP Public Private Partnership

RBD River Basin District

RBMP River Basin Management Plans
RMP Record of Monuments and Places

RPG Regional Planning Guidelines

RPS Record of Protected Structures

RWP The Rural Water Programme

S.I. No. Statutory Instrument Number

SAA Shannon Airport Authority

SAC Special Area of Conservation SDZ Strategic Development Zone

SEA Strategic Environmental Assessment

SEO Strategic Environmental Objective

SFRA Strategic Flood Risk Assessment

SIRBD Shannon International River Basin District

SO<sub>2</sub> Sulphur dioxide

SPA Special Protection Area

SuDS Sustainable Drainage Systems

WFD Water Framework Directive

WMU Water Management Units

WRBD Western River Basin District

WSIP The Water Services Investment Programme

WWTP Waste Water Treatment Plant

#### Glossary

#### Alternatives (Reasonable)

Alternatives should take into account the objectives and geographical scope of the P/P. There can be different ways of fulfilling the P/P objectives, or of dealing with environmental problems. The alternatives should be realistic, capable of implementation and should fall within the legal and geographical competence of the authority concerned.

#### **Appropriate Assessment**

An assessment of the effects of a plan or project on the Natura 2000 network. The Natura 2000 network comprises Special Protection Areas under the Birds Directive, Special Areas of Conservation under the Habitats Directive and Ramsar sites designated under the Ramsar Convention (collectively referred to as European sites).

#### **Baseline Environment**

A description of the present state of the environment of the P/P area.

#### **Baseline Survey**

Description of the existing environment against which future changes can be measured.

#### Biodiversity, Flora and Fauna

Biodiversity is the variability among living organisms from all sources including inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species and of ecosystems' (United Nations Convention on Biological Diversity 1992). Flora is all of the plants found in a given area. Fauna is all of the animals found in a given area.

#### **Biotic Index Values (Q Values)**

The Biotic Index Values, or Q values, are assigned to rivers in accordance with biological monitoring of surface waters - low Q ratings, as low as Q1, are indicative of low biodiversity and polluted waters, and high Q ratings, as high as Q5, are indicative of high biodiversity and unpolluted waters. Good status as defined by the Water Framework Directive equates to approximately Q4 in the national scheme of biological classification of rivers as set out by the Environmental Protection Agency.

#### **Birds Directive**

EU Council Directive of 2nd April 1979 on the conservation of wild birds (79/409/EEC).

#### **Built Environment**

Refers to both architectural heritage and archaeological heritage.

#### **Cumulative Effects**

Effects on the environment that result from incremental changes caused by the strategic action together with other past, present, and reasonably foreseeable future actions. These effects can result from individually minor but collectively significant actions taking place over time or space.

#### Data

Includes environmental data, proxy data, any other relevant statistical data.

#### **Designated Environmental Authority**

An organisation that must be consulted in accordance with the SEA Regulations. For Ireland these are the Environmental Protection Agency (EPA), the Department of the Environment, Community and Local Government (DoEHLG) and the Department of Communications, Energy and Natural

Resources (DCENR) and in certain circumstances the Department of Agriculture, Food and the Marine (DAFM) and the Department of Arts, Heritage and the Gaeltacht (DAHG).

#### **Ecology**

The study of relationships between living organisms and between organisms and their environment (especially animal and plant communities), their energy flows and their interactions with their surroundings.

#### **Environmental Assessment**

The preparation of an environmental report, the carrying out of consultations, the taking into account of the environmental report and the results of the consultations in decision-making and the provision of information on the decision (in accordance with Articles 4 to 9 of the SEA Directive).

#### **Environmental Characteristics**

Environmental resources, issues and trends in the area affected by the P/P.

#### **Environmental Impact Assessment (EIA)**

An ordered exercise designed to enable the environmental impacts of a proposed development/project to be anticipated before the project is carried out.

#### **Environmental Impact Statement (EIS)**

A statement of results from the ordered exercise which focuses on anticipating all environmental impacts of significance of a proposed development, prior to implementation or construction, and which specifies those measures which should be taken to eliminate or mitigate such impacts to an acceptable level.

#### **Environmental Indicator**

An environmental indicator is a measure of an environmental variable over time, used to measure achievement of environmental objectives and targets.

#### **Environmental Objective**

Environmental objectives are broad, overarching principles which should specify a desired direction of environmental change.

#### **Environmental Problems**

Annex I of Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27 June 2001, on the assessment of the effects of certain plans and programmes on the environment (the Strategic Environmental Assessment Directive) requires that information is provided on 'any existing environmental problems which are relevant to the plan or programme', thus, helping to ensure that the proposed strategic action does not make existing environmental problems worse. Environmental problems arise where there is a conflict between current environmental conditions and ideal targets. If environmental problems are identified at the outset they can help focus attention on important issues and geographical areas where environmental effects of the plan or programme may be likely.

#### **Environmental Receptors**

Include biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological) and landscape as listed in the SEA Directive. This list is not exhaustive, and can include other receptors which may arise for a particular P/P.

#### **Environmental Report (ER)**

A document required by the SEA Directive as part of an environmental assessment which identifies, describes and evaluates the likely significant effects on the environment of implementing a plan or programme.

#### **Environmental Targets**

A target usually underpins an objective often having a time deadline that should be met and should be accompanied by limits or thresholds.

#### **Environmental Vectors**

Environmental vectors are environmental components, such as air, water or soil, through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings.

#### **Evolution of the Baseline**

A description of the future state of the baseline in the absence of a plan or programme assuming 'business as usual' or 'do nothing' scenarios, depending on which is more reasonable for the P/P being proposed.

#### **Extended Habitats Directive Assessment**

This refers to a more detailed assessment of the potential impact of a plan or policy on a Natura 2000 site if an initial screening suggests that a negative impact is likely.

#### **Geographical Information System (GIS)**

Refers to a computer system that collects, stores, views and analyses geographical information and commonly creates maps as an output.

#### Geology

Science of the earth, including the composition, structure and origin of its rocks.

#### **Habitat**

Area in which an organism or group of organisms live.

#### **Habitats Directive**

EU Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

#### **Habitats Directive Assessment**

An assessment of the effects of a plan or project on the Natura 2000 network. The Natura 2000 network comprises Special Protection Areas under the Birds Directive, Special Areas of Conservation under the Habitats Directive and Ramsar sites designated under the Ramsar Convention (collectively referred to as European sites)

#### **Hierarchy of Plans**

Both higher and lower level P/P relevant to the P/P being assessed.

#### Indirect effect

Any aspect of a P/P that may have an impact (positive or negative) on the environment, but that is not a direct result of the proposed P/P. May also be referred to as a secondary effect.

## Interrelationships

Associations or linkages, related to environmental impact of the proposed P/P usually on environmental receptors.

#### **Issues Paper**

Paper produced as part of the consultation process, usually for Land Use Plans, to facilitate consultation with stakeholders on key issues.

#### **Invasive Alien Species**

Plants or animals which did not originally occur in Ireland before human colonisation of the country and which are expanding their numbers and distribution so as to cause a competitive threat to such native fauna and flora.

#### **Key Environmental Issues**

Those significant environmental issues, which are of particular relevance and significance within a P/P area and/or the zone of influence of that P/P. These issues should be identified during SEA Scoping process.

#### **Key Environmental Receptors**

Aspects of the environment likely to be significantly impacted by the proposed P/P.

#### **Material Assets**

Critical infrastructure essential for the functioning of society such as: electricity generation and distribution, water supply, wastewater treatment transportation etc.

#### **Member States**

Those countries that belong to the European Union.

#### Mitigate

To make or become less severe or harsh.

#### **Mitigation Measures**

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing a human action, be it a plan, programme or project. Mitigation involves ameliorating significant negative effects. Where there are significant negative effects, consideration should be given in the first instance to preventing such effects or, where this is not possible, to lessening or offsetting those effects. Mitigation measures can be roughly divided into those that: avoid effects; reduce the magnitude or extent, probability and/or severity of effects; repair effects after they have occurred; and compensate for effects, balancing out negative impacts with other positive ones.

**Monitoring** A continuing assessment of environmental conditions at, and surrounding, the plan or programme. This determines if effects occur as predicted or if operations remain within acceptable limits, and if mitigation measures are as effective as predicted. The primary purpose of monitoring is to identify significant environmental effects which arise during the implementation stage against those predicted during the plan preparation stage.

#### **Monitoring Programme**

A detailed description of the monitoring arrangements to be put in place to carry out the monitoring of the impact of the proposed P/P on the environment including; frequency of monitoring, who has responsibility for monitoring, and responses if monitoring identifies significant negative impacts.

#### Natura 2000 Site

Designated European Site. In combination Special Areas of Conservation and Special Protection Areas will constitute Natura 2000 network of protected sites for habitats and species across the EU.

#### **Natural Heritage**

Refers to habitats and species of flora and fauna.

#### **Non-technical Summary**

A summary of the findings of the ER, summarized under the headings listed in Annex 1 of the SEA Directive that can be readily understood by decision- makers and by the general public. It should accurately reflect the findings of the ER.

#### **Plan or Programme**

Including those co-financed by the European Community, as well as any modifications to them which are subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and which are required by legislative, regulatory or administrative provisions.

In accordance with the SEA Directive, P/P that require SEA are those that fulfill the conditions listed in Article 2(a) and Article 3 of the SEA Directive.

#### **Post-mitigation Residual Impacts**

Environmental effects that remain after mitigation measures have been employed.

#### **Protected Structure**

Protected Structure is the term used in the Planning Act of 2000 to define a structure included by a planning authority in its Record of Protected Structures. Such a structure shall not be altered or demolished in whole or part without obtaining planning permission or confirmation from the Planning Authority that the part of the structure to be altered is not protected.

#### **Proxy Data**

Is a measure of activity resulting from a P/P which provides information on environmental impact without the need for a direct measure of an environmental receptor. For example, an increase in the number of vehicles (activity resulting from a P/P) can provide information on the impact on air quality and greenhouse gases without having to measure the concentration of these parameters in the receiving environmental receptor.

#### **Public**

One or more natural or legal persons and, in accordance with national legislation or practice, their associations, organisations or groups.

#### **Recorded Monument**

A monument included in the list and marked on the map which comprises the Record of Monuments and Places that is set out County by County under Section 12 of the National Monuments (Amendment) Act, 1994 by the Archaeological Survey of Ireland. The definition includes Zones of Archaeological Potential in towns and all other monuments of archaeological interest which have so far been identified. Any works at or in relation to a recorded monument requires two months' notice to the Department of the Environment, Community and Local Government under section 12 of the National Monuments (Amendment) Act, 1994.

#### Scoping

The process of deciding the content and level of detail of an SEA, including the key environmental issues, likely significant environmental effects and alternatives which need to be considered, the assessment methods to be employed, and the structure and contents of the Environmental Report.

#### Screening

The determination of whether implementation of a P/P would be likely to have significant environmental effects on the environment. The process of deciding whether a P/P requires SEA.

#### **SEA Directive**

Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'.

#### **SEA Statement**

A statement summarising:

- how environmental considerations have been integrated into the P/P

- how the ER, the opinions of the public and designated authorities, and the results of transboundary consultations have been taken into account
- the reasons for choosing the P/P as adopted in the light of other reasonable alternatives.

#### **Secondary Effect**

Effects that are not a direct result of the P/P. This is another name for 'indirect effect'.

#### Sensitivity

Potential for significant change to any element in the environment that is subject to impacts.

#### **Short-term Effects**

These are typical of those effects that may occur during construction stage of a development, for example, the increased traffic going to and from a site during construction, or, the noise associated with construction activities.

#### **Significant Effects**

Effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.

#### SPA

Special Protection Area under Birds Directive (79/409/EEC), designated for bird species listed in Annex I of the Directive, in particular internationally important concentrations of migratory and wetland birds. Designation is focused on habitats of these species.

#### **Statutory Authority**

The authority by which or on whose behalf the plan or programme is prepared.

#### **Statutory Instrument**

Any order, regulation, rule, scheme or bye-law made in exercise of a power conferred by statute.

#### **Strategic Actions**

Strategic actions include: Policies, which may be considered as inspiration and guidance for action and which set the framework for plans and programmes; Plans, sets of co-ordinated and timed objectives for the implementation of the policy; and Programmes, sets of projects in a particular area.

#### Strategic Environmental Assessment (SEA)

Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt it. The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.

#### Strategic Environmental Objective (SEO)

Strategic Environmental Objectives (SEOs) are methodological measures which are developed from international, national and regional policies which generally govern environmental protection objectives and against which environmental effects can be tested.

#### **Synergistic Effect**

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Effects that, when totalled, result in a greater or lesser effect than the sum of the individual effects.

#### **Threshold**

Magnitude of a project, which if exceeded, will trigger the requirement for an Environmental Impact Assessment.

## **Transboundary Consultation**

If a plan or programme is being prepared that is likely to have significant effects on the environment in another Member State, or where a Member State likely to be significantly affected so requests, the Member State in whose territory the plan or programme is being prepared shall, before the plan or programmes adoption or submission to the legislative procedure, forward a copy of the draft plan or programme and the relevant environmental report to the other Member State.

#### **Zone of Influence**

The area over which a plan can impact on the environment.

## 1 Non-Technical Summary

#### Introduction

Recreational facilities and amenities exist at regional, county and local levels and perform a number of inter-related functions. They are an integral part of the quality-of-life infrastructure and contribute significantly to the physical, mental and social health of the population; they contribute significantly to the attractiveness of an area as a location for inward investment and as a desirable destination for a mobile labour market; and they add to the tourism and visitor infrastructure particularly in the context of activity and adventure holidays.

Over recent years the significant improvements in the traffic and transport infrastructure of the Mid-West region has resulted in substantial increases in both intra and inter-regional accessibility. This means that facilities and other recreation resources that may not have been accessible in a meaningful way have now become more accessible to the population of the region and visitors alike.

Sports and recreational infrastructure has, historically, been largely provided by local communities in towns, rural areas and counties. With some notable exceptions (major sporting facilities for example), facilities and infrastructure has often been put in place with the intention of providing for a local population and its visitors alone. Often, little thought has been given to the potential of the facility to serve a wider population outside the community or the applicable administrative area as a whole. This has sometimes resulted in the wasteful duplication of facilities, difficulties being experienced by the owners and management of the facilities in ensuring their on-going viability and under-utilisation of expensive infrastructure.

It is to address these issues that it has been agreed between the relevant Local Authorities that a Limerick and Clare Sports and Physical Recreation Strategy (LCSPRS) be developed.

It has also been agreed and is included in the brief for this piece of work, that an SEA and a Habitats Directive screening be carried out as part of the process.

# Outline of the contents and main objectives of the strategy and of its relationship with other relevant plans, programmes and policies

There are many plans, programmes and legislative requirements that have a relevance to the strategy. However, many of these are of more relevance at city and county level as the executive agencies responsible for their implementation are the Local Authorities and other public and private decision-makers. The LCSPRS is more relevant to those high-level strategic plans and programmes that reflect the same overarching and co-ordinating role as the LCSPRS. These include —

#### **EU/International**

- Agenda 21
- The Sixth Environment Action Programme (EAP) of the European Community 2002-2012

- The EU Sustainable Development Strategy (SDS)
- Kyoto Protocol
- Water Framework Directive (2000/60/EC) as amended
- Floods Directive (2007/60/EC)
- The Drinking Water Directive (DWD), (98/83/EC) 1998
- EC Freshwater Fish Directive, (78/659/EEC) 1978
- The new Groundwater Directive, (2006/118/EC) 2006
- EC Bathing Water Quality Directive, (2006/7/EC) 2006
- European Convention on the Protection of the Archaeological Heritage, 1992 (The Valletta Convention)
- World Heritage Convention
- EU Biodiversity Strategy to 2020
- EU Directive on the Conservation of Wild Birds, (2009/147/EC) 1979
- EU Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, (92/43/EEC), 1992
- European Communities (Birds and Natural Habitats) Regulations 2011
- The Convention for the Protection of the Marine Environment of the North- East Atlantic (the OSPAR Convention)
- UN Convention of Biological Diversity, 1992
- SEA Directive Assessment of the effects of certain plans and programmes on the Environment, (2001/42/EC) 2001
- Climate Change Programme (ECCP II)
- European Landscape Convention 2000

#### **National**

- Sustainable Development: A Strategy for Ireland, 1997
- Making Ireland's Development Sustainable 2002
- National Development Plan (NDP) Transforming Ireland A Better Quality of Life for All 2007-2013
- National Spatial Strategy 2002-2020

- Draft National Sports Facilities Strategies, 2012, Department of Transport, Tourism and Sport
- Irish Trails Strategy, Irish Sports Council, 2007
- Smarter Travel, A Sustainable Transport Future, A New Transport Policy for Ireland 2009-2020
- National Cycle Policy Framework 2009-2012
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (DoEHLG, OPW), 2009
- National Renewable Energy Action Plan, (NREAP) 2010
- Actions for Biodiversity 2011 2016, Ireland's 2nd National Biodiversity Plan
- National Heritage Plan, (2002)
- National Climate Change Strategy (2007-2012)
- A National Landscape Strategy for Ireland Strategy Issues Paper for Public Consultation, (Sept 2011)
- Draft Landscape and Landscape Assessment Guidelines, (2000)

#### Regional

- Mid-West Regional Planning Guidelines 2010 2022
- Mid-West Area Strategic Plan
- Mid-West Climate Change Strategy 2008
- Lough Derg Sustainable Marina, Recreational and Tourism Study
- Shannon IRBD River Basin Management Plan, 2009-2015
- Western RBD Basin Management Plan, 2009-2015

#### Local

- Action Plans of Local Sports Partnerships
- City and County Development Plans
- City and County Development Strategies
- Local Biodiversity Action Plans
- Groundwater Protection Schemes
- County and City Tourism Plans

- Strategies of Major Sporting Bodies
- Limerick Regeneration Strategies and Master-plans
- Development plans of major facility providers
- Strategies and Action Plans of Local Development Companies

The principal objectives of the Strategy are as follows –

- The development of a set of goals and objectives for the provision of sporting and physical recreation facilities in the area
- The preparation of an analysis of the existing provision within the focus area and adjacent areas
- The implementation of an evaluation of the population necessary to support different types of facility
- An assessment of current and future population within the relevant areas
- The identification of any gaps or excess in the provision of larger-scale facilities
- The identification of the resources available and gaps in provision for those with disabilities who wish to participate in sports and active recreation
- The identification of any opportunities for the provision of facilities that address a new sporting or active recreation area
- The development of a set of policies that will guide Local Authorities in their land-use management and development functions and provide information to others who may wish to undertake the development of sports or physical recreation projects

#### **Strategic Policies**

In the light of the strategic objectives that are outlined above, the following are the strategic policies that will guide decision-makers with respect to the provision of sports and physical recreation facilities throughout Limerick and Clare –

# **Strategic Approach to Facility Distribution**

- 1 That a hierarchy of facility provision will be adopted as follows
  - Large scale stadia and facilities
  - Multi-sport facilities at key locations
  - Smaller scale multi-sport facilities
  - Community-level facilities for sports and physical recreation at a level smaller than the multisport facilities referred to above
  - Specific facilities provided by individual sports and recreation clubs and organisations to meet their own needs

- 2 That larger-scale sports and physical recreation stadia and facilities be located within the areas of Limerick Metropolitan Area, Shannon and Ennis in order to maximise accessibility of larger populations, to maximise the viability of the facilities and to maximise the potential use of public transport facilities for providing access to these facilities. In particular, where significant areas have been developed or are planned for development provision should be made for the establishment of multi-sports facilities in accordance with the recommendations of the Draft National Sports Facilities Strategy.
- 3 That new stadia for team games will generally not be permitted within the area other than
  - the provision within Limerick Metropolitan Area of one medium-sized stadium not exceeding a capacity of 7,500 with a primary focus on the accommodation of League of Ireland soccer matches and
  - the provision of a new stadium at an appropriate location and which replaces an existing stadium.
- 4 That the provision of facilities which have specific needs which require them to be located outside the Limerick Metropolitan Area/Shannon/Ennis area will be accommodated subject to addressing the environmental considerations outlined below
- That key sub-regional locations be identified for the provision of all-weather sports facilities to accommodate a wide range of sports and physical recreation activities and such that, no person is significantly more than 20 kilometres from such a facility. These locations will relate to the regional structure outlined in the Regional Planning Guidelines and should include -
  - Provision of facilities in the Limerick Metropolitan Area in accordance with the
    considerations outlined at section 4.3.2 of this strategy including the provision of at least
    one area to serve the North side of Limerick Metropolitan Area and one area to serve the
    South side of Limerick Metropolitan Area. These facilities should incorporate the facilities set
    out in the following two paragraphs and which should not be in addition to the facilities
    referred to in this paragraph
  - One area to provide an integrated training facility for soccer within the Limerick Metropolitan Area
  - One area to provide a multi-sports facility for Limerick Institute of Technology
  - One multi-sports all-weather facility in Shannon
  - The enhancement of the Lee's Road Regional Sports Facility in Ennis and the provision of a substantial indoor sports facility in the town of Ennis that will be managed as part of the overall Lee's Road facility
  - The provision and/or upgrading of one integrated all-weather multi-sports facility in key settlements within Limerick and Clare but outside the Limerick Metropolitan Area/Ennis/Shannon area. The precise distribution of these locations should be decided by the Planning Authorities acting in consultation but should reflect the sub-regional centres identified in the Regional Planning Guidelines and should also have regard to the locations where substantial sports facility development has taken place or is under way. In that context the following locations should be included for consideration -
    - Kilrush
    - o Killaloe/Ballina
    - Lisdoonvarna
    - o Lahinch/Ennistymon

- o Tulla
- Scarrif
- Newcastlewest
- o Kilmallock
- Rathkeale

Over time the facilities at these locations should include the following as a minimum –

- One full-size, floodlit all-weather playing pitch capable of accommodating those games that require the largest playing area
- o Grass pitches for a variety of sports
- A floodlit walking/running track incorporating outdoor gym facilities
- o An indoor facility capable of accommodating full basketball games
- Facilities for other sports such as tennis and bowls
- A play area
- Training areas

All these facilities may not be on the one site but, where they are on a number of sites, they should be managed and maintained by a single entity.

- That smaller-scale facilities be provided at other intermediate locations such that no person is generally more than 10 kilometres from such a facility. These facilities should include a floodlit all-weather playing area that is not of full size, a walking track, a playground, an outdoor gym and an indoor games hall. In these locations attempts should be made to maximise the use of existing facilities and to upgrade them where necessary, developing new facilities only where unavoidable. Particular attention should be paid to the provision of training facilities at these locations as the absence of such facilities can prove a significant barrier to participation in sports.
- 7 That the provision of facilities that allow the better use and enjoyment of sporting and physical recreation facilities which make use of natural resources will generally be permitted provided that they are of an appropriate scale and address the environmental conditions as set out below. Where possible this should be achieved by the enhancement of existing facilities rather than the provision of new facilities. In addition, areas may be identified as hubs for particular forms of sporting and physical recreation activities related to their natural amenities and/or geographic location and development plans prepared to facilitate the development of such hubs.
- 8 That the provision of smaller-scale community-based facilities will continue to be supported subject to the requirements as set out above and the meeting of environmental considerations as set out below. Such facilities might. In particular, include a children's playground, a safe walking/cycling route and a community hall used for non-competitive physical recreation.

#### **Social and Physical Access to Facilities**

9 That the needs of all age-groups are considered when facilities are being developed and that, in particular, the needs of the young and of older people are given particular attention. With regard to the former this should relate to the incorporation of age-appropriate green spaces into all developments in accordance with the provisions of the document 'Play Space Guidelines 2007 (DDDA 2006). With regard to the latter it should include the provision of separate cycle paths, the provision of level, well-maintained, non-slip walkways and convenient access to parks and green spaces as recommended by the WHO Age-Friendly Cities Programme. This policy will be

implemented through the criteria used for determining the basis on which locally-controlled public funds will be allocated to projects; through the criteria used to determine which proposals to other funders should receive the backing of public bodies in the area; and through the use of other planning and licensing processes where possible and appropriate.

- 10 That new facilities will be provided in a manner that will seek to encourage physical activity amongst different age groups in a single location by, for example, providing a children's playground and an adult outdoor gym or walking area in close proximity. In addition, that where significant facilities are planned, these should be located, where possible, close to schools and public open space.
- 11 That particular consideration be given to the provision within publicly-funded facilities, of the spaces and equipment necessary to accommodate those activities that have been identified as being most likely to encourage additional participation in sports or physical activities amongst the resident population
- 12 That the needs of those with a disability are provided for in the design and development of facilities for sports and physical recreation. Such an approach should include the following
  - The incorporation of provision for those with a disability in the design of new facilities
  - The making of special provision for those with a disability in certain circumstances e.g. the provision of boardwalk areas on walking routes
  - The development and implementation of a programme of upgrading of those facilities that cannot currently adequately accommodate those with disabilities

This policy will be implemented through the criteria used for determining the basis on which locally-controlled public funds will be allocated to projects; through the criteria used to determine which proposals to other funders should receive the backing of public bodies in the area; and through the use of other planning and licensing processes where possible and appropriate.

13 That the needs of those who cannot afford to pay for the use of facilities be taken into account when new facilities or the integration of existing facilities are being proposed and that mechanisms are incorporated into the project proposal which will help to address this issue. In addition and in order to facilitate access by those with limited resources, that the pricing policies of facilities be such as to require a reasonable level of payment by those that can afford to do so.

In addition that the needs of the working population be taken into account when new facilities or the integration of existing facilities are being proposed and that mechanisms are incorporated into the project proposal which will help to address this issue with particular regard to the provision of opening hours that are convenient for this population.

Also, that the provision of public transport to proposed facilities and to existing facilities not currently served by such transport will be examined as part of the objective of maximising access to sports and physical recreation opportunities for all, with the intention of arranging for the establishment of such services where possible.

This policy will be implemented through the criteria used for determining the basis on which locally-controlled public funds will be allocated to projects; through the criteria used to determine which proposals to other funders should receive the backing of public bodies in the area; and through the use of other planning and licensing processes where possible and appropriate.

#### The Need for New Facilities

- 14 That new developments of the following types of facility will generally not be supported within the area unless it can be clearly demonstrated that there is a need for the facility and that its provision will not impact on the viability of other existing facilities either within the strategy area or in areas that border it
  - Golf Course
  - Private swimming pool other than in an education context
  - Racecourse
  - Greyhound Stadium
- 15 That facilities and resources associated with the following sports and activities will generally be permitted subject to meeting environmental protection requirements and the identification of a market need that will not give rise to deadweight or displacement; and that proactive actions will be taken to enhance access to such facilities particularly through the provision of year-round parking, pathway and storage facilities where required.
  - Walking trails both urban (Sli na Slainte) and rural and associated amenities such as sculpture trails or nature walks. The provision of walking trails in urban environments is of specific benefit as it provides for the most common form of physical activity undertaken by the urban population, it requires little investment or maintenance as most of the facilities are in place and it offers an opportunity to link sports and recreation provision with the objectives of the Smarter Travel agenda.
  - Dedicated cycle routes. In this regard particular attention should be paid to the potential to
    use abandoned routes such as the Abbeyfeale railway line and the West Clare railway line
    for the provision of new facilities
  - Mountain-bike trails. In this regard, in particular, the Ballyhoura bike trail system should be
    developed and enhanced with the provision of additional facilities to accommodate a wide
    range of users including families.
  - Other trails including long-distance walking and cycling routes which should be developed in accordance with the principles set out in the publication 'Creating Green Infrastructure in Ireland' (Comhar 2010).
  - Water-based activities on the Shannon, the Shannon Estuary, the Fergus and the Fergus
    Estuary including sailing, marine sailing, canoeing and kayaking, rowing, surfing, windsurfing, and fishing. In this regard, specific provision should be made for rowing within the
    Limerick Metropolitan Area in order to benefit from one of the best stretches of rowing
    water in the country by, amongst other things, the holding of regattas in the area.
  - Equestrian Activities. In this regard specific provision should be made for indoor facilities for equestrian activities in Limerick and within the Ennis Area.
  - Children's playgrounds and adult outdoor gyms particularly in areas where the level of provision is less than the national average. Such provision should be made in accordance with the standards set out in the document 'Play Space Guidelines 2007 (DDDA 2006).
  - Other outdoor activities such as mountain climbing, orienteering and rock-climbing

#### Integration of the Use of Facilities

- 16 That where public access to a particular type of facility is not available but a private facility is available in the area, to seek to make arrangements with the private facility owner for the provision of public access.
- 17 That the adoption of integrated multi-sport models of facility provision be promoted and supported where possible and appropriate. Such multi-sport models will promote the inclusion of public, voluntary, school-based and privately-owned facilities in a particular area under a joint management body in order to maximise the use of existing facilities, to ensure that facilities do not lie idle more than is necessary and to ensure that where new facilities are proposed they will be provided only where there is a clear lack of capacity in the area. The promotion of such a model will be carried out through the nature of the criteria used for determining the basis on which locally-controlled public funds will be allocated to projects; through the criteria used to determine when proposals to other funders should receive the endorsement of public bodies in the area; through the use of other planning and licensing processes where possible and appropriate; and through the promotion of the adoption of this policy by funders at national and regional level.
- 18 That it will be a policy of all those engaged in the development and management of sports and physical recreation in the area to promote the adoption of the concept of Healthy Stadia.
  - A Healthy Stadium is, one that promotes the health of visitors, fans and the local community and one that provides a place where people can go and have a positive, healthy experience playing or watching sport.
  - The Healthy Stadia concept is firmly based on a commitment to partnership and requires a multi-stakeholder approach comprising three elements; creating supportive and healthy working and living environments, integrating health promotion into the daily activities of the setting and developing links with other settings and with the wider community.
- 19 That where a new sports or community hall is being provided it is designed to be of a size that will accommodate those sports that require the greatest floor area and that the granting of permission for the provision of such a development be dependent on its being designed to such a standard.
- 20 That where new all-weather pitches are being provided they should be designed to accommodate those sports that require the largest playing area and that provision be made for the installation of flood-lighting when possible.
- 21 That the provision of sports hall and pitch facilities be based on an integrated multi-sport model and that the promoters of any such facility be required to indicate how such integration will be implemented and that undertakings be given with regard to the ongoing provision of coaching and other supports.
- 22 That different models for the integration of sports facility provision at community level be supported. These models include a single-site model in which all facilities both indoor and outdoor are accommodated on the one site and a multi-site model in which both new and existing facilities located on one or more sites are managed in an integrated way through the use of mechanisms that have a legal status and that can ensure the on-going participation of facility owners and the overall community.
- 23 That where integrated facilities are being provided a floodlit walking route is incorporated as part of the overall development.
- 24 That the local community served by a particular facility be involved in the design, development and management of such facility.

#### **Development and Management of Sports Clubs**

- 25 That collaborative mechanisms for the establishment of new sports clubs at key locations be examined to facilitate the taking up of a range of individual non-invasive sports by all age groups. Such collaborative mechanisms should include community and voluntary organisations, national governing bodies, local development organisations, public bodies and educational bodies and would be appropriately promoted and supported by the Local Sports Partnerships. The types of sports that might be considered under this heading include gymnastics, martial arts, racquet sports, aerobics, dance, athletics, sulky-racing and cycling as well as team sports. Sports that have a specific historic and cultural value should be particularly considered for support under this heading.
- 26 That the enhancement of the Governance of individual organisations that own and manage facilities that are or that might be used for sports and physical recreation activities be supported in order to provide the management bodies of such organisations with the confidence and the capacity to engage in the collaborative and integrated models and processes outlined in this document. Mechanisms for the implementation of this objective will include the application of a Club Mentoring Programme and the provision of coordinated support to voluntary organisations.
- 27 That the tenure of sporting organisations with regard to land they hold from public authorities will be examined and amended where necessary and possible with the purpose of facilitating the achievement of the community-based, multi-sport integrated approaches referred to in this strategy.
- 28 That with regard to a small number of community and voluntary organisations which provide substantial sports and physical recreation facilities that are open to the general public and which face on-going uncertainties and funding challenges arising from their public service role, a long-term and sustainable funding system be identified and developed for such organisations and that the barriers to such organisations accessing funding are addressed. Such funding mechanisms should provide for on-going maintenance and development as well as providing support for normal operational costs.

#### **Economic Potential of Sport and Physical Recreation**

- 29 That the needs of the tourism sector are taken into account when proposals for new development or activities are being considered and that the proposers of facilities which will be reliant on visitors for their viability be requested to provide evidence of the likely use of the facility by visitors to the area and that the proposed facility will not undermine the viability of existing facilities in the area.
- 30 That pro-active steps be taken to promote international, national and regional sporting events within the area, particularly those such as the Great Limerick Run that involve mass participation and that the benefits of the designation of Limerick as Ireland's European City of Sport be built on in this context. In addition, the development of Limerick as a centre for Sports Medicine should be pursued through the collaboration of sporting organisations, Higher Education Institutes and other relevant organisations.

#### **Environmental Considerations**

31 That where existing facilities are being upgraded the opportunity will be taken to upgrade those aspects of the facility that have an impact on the environment including the reduction in the use of energy, the improvement in the systems used for the treatment and disposal of waste-water and the management of associated activities to address any negative environmental impacts arising from them.

- 32 That where infrastructure developments are being undertaken, consideration will be given to whether and to what extent facilities for sport and physical recreation can be incorporated in the design and that where such provision is possible it will be made.
- 33 That when open space is being provided in association with other developments or as standalone amenities the quality of the open space as well as its quantity will be assessed with particular regard to its role in promoting sports and physical recreation either in itself or through the added value it provides for existing facilities. A matrix for the provision of open space such as that contained in the Limerick City Development Plan should be adopted.
- 34 That nothing in this strategy should be interpreted so as to prevent the implementation of the Strategic Integrated Framework Plan for the Shannon Estuary when it is adopted insofar as it applies to Sport and Physical Recreation.
- 35 That actions be taken to implement a 'Leave no Trace' approach to the use of the natural environment for sports and physical recreation so that the any natural amenity used by the public should not be impacted upon by that use and anything taken into the natural environment will be taken out again by the user.

## Methodology

This Environmental Report is a central element of the Strategic Environmental Assessment (SEA) process, and it has been prepared in the context of the following:

- S.I. No. 435 of 2004 (European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 as amended by S.I. No. 200 of 2011 (European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011)
- DEHCLG Guidelines on Habitats Directive Assessment (HDA) for Regional Planning Guidelines;
- EPA Guidance Documents available at <a href="http://www.epa.ie/whatwedo/advice/sea/resources/">http://www.epa.ie/whatwedo/advice/sea/resources/</a>

A number of principles have been adopted in this SEA:

- 1. The purpose of the SEA is to enable better-informed decisions to be made by enabling the structured assessment of environmental impacts of actions that might arise as a result of decisions taken.
- 2. The environmental parameters considered in this SEA are those that are relevant to the impacts of the provision of sports and physical recreation facilities and activities within the area concerned.
- 3. This SEA has been prepared in the context of the high-level strategic nature of the overall process.
- 4. The LCSPRS and therefore the SEA do not seek to determine the ways in which other decision-makers address their own responsibilities; they focus on environmental the outcomes that are being sought within the context of the LCSPRS.

The carrying out of an SEA and of a HDA Screening were a requirement of the brief for the preparation of the Sports and Recreation Strategy. In the light of that requirement it was not considered necessary to carry out the normal SEA screening so the process proceeded straight to the scoping stage.

A variety of key stakeholders were consulted in the development of this strategy. These consultations were based on a stakeholder engagement proposal that was developed in consultation with the Steering Group. The main purposes of the consultations were as follows –

- To identify the current level of provision of key facilities by the stakeholders
- To identify extent of the current capacity of those facilities that is utilised
- To identify any plans for future development
- To identify the catchment area of the users of the facility (this was generally possible on an anecdotal basis only)
- To identify any additional developments in the area that were considered necessary by the stakeholders
- To identify the accessibility of facilities for those with a disability and others with particular needs
- To identify accessibility to facilities for the general community including those who may often not be in a position to gain access to certain facilities

The following are the stakeholders who were consulted during this process. Some of this consultation took place through the Steering Group and some through specific meetings with the relevant organisations.

- All Local Authorities in the area
- Mid-West Regional Authority
- Limerick City Regeneration Agency (now incorporated into Limerick City Council)
- Sporting bodies responsible for the provision of major facilities or the organisation of major events including GAA, FAI and IRFU
- Commercial providers of large-scale facilities such as horse and greyhound racing
- Local Sports Partnerships
- Coillte
- Local Development Companies
- Shannon Development
- Department of Environment, Community and Local Government
- Third-level Institutions in the area
- Bodies with an input into the provision of recreational facilities for those with a disability

• Certain community groups with particular approaches to the provision of facilities

Some of this consultation took place through the Steering Group, others took place in face-to-face meetings and some though telephone discussions.

Scoping was carried out with the five environmental authorities prescribed in the legislation; the Environmental Protection Agency (EPA), Department of the Environment, Community and Local Government, the Department of Arts, Tourism and Sports, The Department of Agriculture, Food and the Marine and the Department for Communications, Energy and Natural Resources. The Scoping Document is attached at Appendix One. The responses to the Scoping Document were taken into account in preparing this report.

# Description of relevant aspects of the current state of the environment and the evolution of that environment without implementation of the plan

The environmental baseline is described in line with legislative requirements, and includes data relating to the environmental receptors of biodiversity, population, human health, soil, water, air, climatic factors, material assets, cultural heritage and landscape.

#### **Biodiversity**

Counties Limerick and Clare and Limerick City have a richness of natural habitats, plants, birds and animals. There are 49 Special Areas of Conservation (SAC) in the area, 37 in Clare and 12 in Limerick. These are sites that are deemed important under the EU's Habitats Directive. Some of the SACs cross county or indeed regional boundaries. The area also has 12 Special Protection Areas (SPAs), which are designated under the EU Birds Directive with 10 in County Clare and in 2 in Limerick City and County. Some of these sites are particularly important from the point of view of sports and physical recreation since they provide the basic resource within which such activities take place and can be impacted on by such activities.

#### **Population**

The population of the area has increased from 278,581 in 2002, to 295,005 in 2006, and to 308,191 in 2011. The average population increase per year from 2002 to 2011 is therefore approximately 2,500 people. While the rate of growth was somewhat less than the national rate, it exceeds the expected level of growth in the 2004 Regional Planning Guidelines. A number of population issues can be noted, based on comparison of 2011 census statistics with those of 2002:

- low rate of population growth in Limerick City and suburbs;
- high rate of population growth in the Co. Limerick areas close to Limerick City
- population decline in some settlements
- some decline in some rural areas

#### **Human health**

Human health is dealt with where appropriate through consideration of other environmental issues such as air and water. Human health also has relevance for sports and physical recreation however,

because sport and exercise can have a positive impact on morbidity and mortality within the general population.

#### Soil

Soil is a non-renewable resource. The main soil types in the Region are grey brown podzolics (good all-purpose soils), gleys (mostly unsuitable for cultivation or for intensive grassland production) and peat. No data were available regarding soil quality for the area, reflecting the paucity of national soil data. However, soil in Ireland is generally considered to be of good quality.

The latest inventory of active quarries, mines and pits in the Region dates from 2001, and recorded 37 facilities. The number of quarries in actual operation is likely to have changed considerably in the intervening period due to the down-turn in the construction industry and the consequent reduction in the demand for aggregate.

There are two landfills in the area, both of which are licensed to operate by the Environmental Protection Agency (EPA).

#### Water

The introduction of the Water Framework Directive (WFD) in 2000 established a new integrated approach to the protection and improvement of Irish aquatic ecosystems and water resources. The main environmental protection objective of the WFD is to ensure all waters achieve "good status" by 2015, and to prevent deterioration in the existing status of waters.

The unit of management for the WFD is the river basin district (RBD). The Shannon International RBD extends from the river's source in Cavan and Fermanagh, to the Dingle peninsula. The Shannon International RBD covers most of the Mid-West Region with a small area of North Clare in the Western RBD.

The area faces a very significant challenge in meeting the main objective of the Water Framework Directive. There are issues with the quality of river, lake, estuary and ground waters. The most recent EPA Report on Water Quality suggests that 7% of the rivers were considered to be of High status, 37% to be Good and 32% to be Moderate.

In addition, that report states 45% of lakes in the RBD are of High or Good status with the remaining 55% being of Moderate status. In the same report, 43% of lakes were assigned High or Good physico-chemical status while the other 57% were assigned Moderate status.

A significant proportion of the region has groundwater in the "extreme" and "high" vulnerability rating classes as recorded in the ground water vulnerability data and classifications of the GSI (<a href="http://spatial.dcenr.gov.ie/imf/imf.jsp?site=Groundwater">http://spatial.dcenr.gov.ie/imf/imf.jsp?site=Groundwater</a>). The vulnerability rating determines the acceptability and characteristics of on-site wastewater treatment systems.

The freshwater bathing sites of Mountshannon and Ballycuggeran on Lough Derg have Blue Flag status. The areas beaches are all of Good quality with the exception of the White Strand at Milltown Malbay which is considered to be of Poor quality due to its failing an e-coli test.

#### **Drinking Water Quality**

Drinking water quality is generally good and improving throughout the area with few exceedances of either micro-biological or chemical parameters within the area in question according to the latest EPA report in 2011. However, there are still some areas where improvements are required and care needs to be taken that this positive and improving situation is maintained.

#### Air

The EPA provides consolidated data for eight air quality parameters. There were no issues with the area's compliance on five of these parameters (sulphur dioxide, particulate matter, lead, benzene and carbon monoxide). Monitoring for nitrogen dioxide at Park Road in Limerick showed three exceedances of an hourly limit, which is not to be exceeded more than 18 times in any calendar year. There was also one exceedance of the 8-hour mean limit for ground-level ozone at the same location. No more than 25 such days are permitted. A ban on bituminous coal came into force in Limerick in 1998. This has lead to a substantial reduction in black smoke concentrations in Limerick, but they are still higher than in Dublin or Cork.

#### **Climatic factors**

Based on the Mid-West Energy Balance & Climate Change Strategy, 2008, it is estimated that the Region produced 4.2 million tonnes of energy-related  $CO_2$  emissions in 2005 (total national emissions of greenhouse gases in 2007 were 69.2 million tonnes of  $CO_2$  equivalent). The transport sector is the greatest single contributor to energy-related  $CO_2$  emissions in the Region (at almost 35%), and emissions from that sector grew significantly between 1990 and 2005.

#### **Material assets**

# Transport

The area is well serviced with a network of National and Regional routes that either pass through or are adjacent to it. Some National Secondary Routes and Regional Routes are also of particular importance from a regional point of view. The area is also well served with rail systems, relatively speaking. Some of the area's rail links are in the process of being upgraded while others have already been improved. Shannon Airport is the most important asset for air transport, though there are other, smaller, private airports of local significance. Limerick City Docks and Foynes are the most important port developments though there are a number of other smaller ports and harbours along the Shannon Estuary.

#### Energy

Moneypoint and Ardnacrusha are the most important electricity generation stations, though there is an increasing number of renewable energy developments within the Region. The natural gas network has been extended to a considerable part of the Region including the Gateway and Hub towns.

#### **Communications**

Generally the Region is well served with cable-based communication and wireless communication has wide coverage. Broadband coverage in the region is variable. Metropolitan Area Networks

(MANs) are available in the major centres but rural areas still have significant limitations in broadband coverage. In addition, broadband penetration in the settlements is limited due to a variety of factors.

#### Water and Wastewater

Major water supply and waste water treatment systems are present in the Gateway City and Town and in the Hub Town. However, these facilities are not adequate to meet current needs in some cases and do not have the spare capacity to meet future needs in others.

Data gathered by the Mid-West Regional Planning Guidelines (MWRPG) Technical Group during the production of the Regional Planning Guidelines indicated that drinking water losses from the distribution networks in the region of typically 40 to 50% (with a lowest loss of 15-25%, and a high of 75%).

The region faces a significant challenge in the effort to meet the requirements of the EU's Urban Waste Water Treatment Directive. According to the latest EPA report on compliance of local authorities in 2009 with the overall requirements of the Directive, seven agglomerations had no secondary treatment, and 20 which had secondary treatment failed standards/guidance values. No data was readily available on the performance of treatment systems for population centres with less than 500 population equivalents, or of on-site wastewater treatment systems (e.g. septic tanks serving a single dwelling). However, it is probable that there are negative environmental impacts arising from a significant proportion of these systems.

#### **Recreation and Tourism**

A number of nationally and regionally significant recreation and tourism assets exist in the region. Those that depend particularly on a high quality environment include the Cliffs of Moher Centre, the Ailwee Caves Centre, the Lough Derg Water Activities Centre, Adare village, Kilrush Creek Marina and Ballina/Killaloe Marina.

In addition major sporting facilities exist in Limerick City and Ennis, while the coastal and estuarine areas of the two counties and some of its upland areas provide significant resources for outdoor sports and physical activities.

#### Cultural heritage

There are over 2,400 protected structures of architectural interest in the area, and 32 architectural conservation areas (19 in Clare and 13 in Limerick). Regarding archaeology, it is estimated that there are about 6,000 protected monuments and sites in the Mid-West. There are also about 100 National Monuments in State Care - 37 in Co. Clare and 62 in Co. Limerick. The Burren has been nominated for inclusion to the UNESCO World Heritage List and the Burren and the Cliffs of Moher have achieved UNESCO World Heritage Site Status.

#### Landscape

The LCSPRS area is rich in the nature and variety of landscape types it contains. Landscapes that are of regional significance include:

- The Atlantic Coast of West Clare characterised by a variety of coastline types, some rocky and some sandy;
- The Karstic area of the Burren between Clare and Galway characterised by its fissured limestone and the small lakes and turloughs of the East Burren complex;
- The Shannon Estuary with long views over water to the far shore;
- The Shannon River characterized by smaller, more intimate views;
- Lough Derg with a number of small islands and surrounded by the upland areas that contain it;
- The upland areas of the Galtee Mountains, Ireland's highest inland mountain range;
- The upland area of the Ballyhoura Hills which run between Limerick and Cork and have many areas of natural beauty;
- The Slieve Felim area of Limerick;
- Slieve Aughty between Clare and Galway.

Many of these areas also contain SACs and SPAs with high-quality habitats and significant levels of biodiversity.

Each of these different landscape types brings unique qualities of experience to the local population and visitors alike. The various landscapes are also subject to a variety of potential negative impacts. These include:

- Inappropriately designed and located developments;
- Changing farming practices leading to landscape degradation;
- The impact of afforestation on the appearance and habitat diversity of the landscape;
- Major infrastructure developments;
- Excessive use for activities associated with tourism, sport and physical recreation;
- The impact of pollution and eutrophication on water bodies.

Many of those areas that are of regional significance cross county and regional boundaries. At present there are a variety of approaches and designations that are applied by the different Planning Authorities and this militates against the coordinated development of the landscape in these areas.

It is important that a common approach is taken to the management of the rural landscape throughout the region in order that its protection and enhancement can be ensured.

#### Evolution of the Region's environment without the implementation of the LCSPRS

The evolution of the region is subject to many policies, plans and programmes. Many of these operate at a higher level than the LCSPRS and many at a lower level. In addition, many of the plans and programmes can be implemented independently of the LCSPRS. Indeed the way in which many of them should be implemented place mandatory obligations on the implementing bodies from the point of view of environmental protection.

The LCSPRS does, however, bring a number of specific factors into consideration particularly those associated with water quality, habitat protection and transportation.

#### Description of the environmental characteristics of areas likely to be significantly affected

and

# Identification of any existing environmental problems which are relevant to the plan, particularly those relating to European protected sites

Section 4 of the main Environmental Report includes an analysis of those topics (parameters) and locations that are likely to be significantly affected by the LCSPRS. Table 1 below presents details on those parameters and locations that are considered to be of high relevance to the LCSPRS. The table also presents information on existing environmental problems which are relevant to the LCSPRS, particularly those relating to European protected sites (i.e. SACs and SPAs).

Table 1.1: Environmental parameters and locations of high relevance to the LCSPRS

Resource / Factor / Receptor	Unit	Nature, scale, fragility	Relevance to LCSPRS	Comments on type of Sporting or Recreational Activity and/or Impacts of these activities
Surface water				
	Lough Derg	Important large body of water susceptible to eutrophication from point and diffuse discharges, and upstream impacts. Multiple demands for recreation, transportation, wastewater discharge, fishing. The Lake has been identified as requiring improvement in the RBD Draft Plan	High	Boating, sailing, water-sports, lakeside recreation, walking, trekking.  Impacts from habitat disturbance, waste-water discharges, visual intrusion, noise and light
	Shannon River	The Shannon River between Lough Derg and the Shannon Estuary bears some of the characteristics of Lough Derg. It is important in environmental terms not only in its own right but because it is feeds the non-saline fraction of the Shannon Estuary	High	Boating, sailing, water-sports, lakeside recreation, walking, trekking  Impacts from habitat disturbance, waste-water discharges, visual intrusion, noise and light
	Shannon Estuary	Important large body of water susceptible to environmental degradation from point	High	Boating, sailing, water- sports, lakeside recreation, walking, trekking

Resource / Factor / Receptor	Unit	Nature, scale, fragility	Relevance to LCSPRS	Comments on type of Sporting or Recreational Activity and/or Impacts of these activities
		discharges, diffuse pollution and upstream impacts. Multiple demands for industry, aquaculture, recreation, transportation, wastewater discharge, fishing. Parts of the estuary have been identified as requiring improvement in the RBD Draft Plan and the whole of the area has been designated as an SPA		Impacts from habitat disturbance, waste-water discharges, visual intrusion, noise and light
	Artificial water bodies	There are a number of these throughout the region	Medium	Some significant regional level water-based sports are possible on these water-bodies. In particular, canals might be developed for a variety of significant water-based activities such as boating  Impacts from wastewater discharges, visual intrusion, noise and light
Ground Water				
	Aquifer Clare	This is a major aquifer system that has significant implications for the Ennis Water Supply. It extends North of Ennis and into the Western RBD as well as being primarily in the Shannon RBD. It has been identified in both RBD Plans as requiring improvement.	Medium	There is no direct activity that would have relevance for the aquifer bodies. However, the development of facilities in areas without piped services would have implications for the aquifers and it is possible that some significant developments could be in this category
	Aquifer Limerick	This is a major aquifer in the vicinity of Limerick City. It lies within the Limerick County jurisdiction and is not a	Medium	There is no direct activity that would have relevance for the aquifer bodies. However, the development of facilities

Resource / Factor / Receptor	Unit	Nature, scale, fragility	Relevance to LCSPRS	Comments on type of Sporting or Recreational Activity and/or Impacts of these activities
		major source of water for the area It has been identified in the RBD Plan as requiring improvement in status		in areas without piped services would have implications for the aquifers and it is possible that some significant developments could be in this category
Coastal Water				
	Atlantic Coast	This is a major resource within the region and is, at least in the areas close to the coastline, subject to threat from both point and diffuse discharges. These areas are also subject to a variety of demands including recreational, agricultural and commercial, though, within the region there is little industrial demand.	High	A variety of water-based activities might be accommodated in this area and would have some relevance. The extent of the impact of the activities likely to take place would not be likely to be significant but the on-shore service bases associated with such activities might be of importance.
Drinking Water				
	Water quality and availability	Drinking water quality and availability is a critical resource in the region. While there is a variety of potential resources some of these are under pressure	Medium	Generally developments would not be likely to have significant implications for drinking water quality. However, the development of facilities in areas without piped services would have implications for the aquifers and it is possible that some significant developments could be in this category
Bathing Water				
	Quality of bathing water	Bathing water is distributed around the region at specific locations. This water is relatively fragile and can	Medium	The development of facilities that make use of bathing water may emerge in the strategy

Resource / Factor / Receptor	Unit	Nature, scale, fragility	Relevance to LCSPRS	Comments on type of Sporting or Recreational Activity and/or Impacts of these activities
Air		reach unacceptable standards without ceaseless vigilance		
All	Greenhouse gas emissions	The region should play its part in achieving national greenhouse gas emission targets. Air is distributed across the region and is a fragile resource in this context.	Medium	The principal impacts on greenhouse gases would arise from traffic and the use of heating, electricity and other energy-using facilities in sports and recreation developments
Biodiversity (Habitats, Flora and Fauna)				
	The Burren	The Burren is a major internationally recognised habitat containing many internationally protected species. It is an area that has emerged in its current form from a variety of human interactions with nature. The area is subject to a variety of conflicting demands – conservation, agriculture, habitation, tourism and recreation and can be subject to the impacts of environmentally significant impacts arising at a distance from it	Medium	The principal sports and recreation activities likely to impact on the Burren are those arising from walking and other trails although other activities such as rock-climbing, potholing and caving might also be of relevance. In addition, the Burren extends into the maritime areas at certain points and may be impacted on by waterbased activities at these locations.
	The Shannon system	As well as its importance from a water point of view, the Shannon system contains many important habitats vulnerable to changes in water quality	Medium	Water-based sports and recreation activities
	Other Natura 2000 sites	Other Natura 2000 sites, are important though	High	A wide variety of activities are possible in

Resource / Factor / Receptor	Unit	Nature, scale, fragility	Relevance to LCSPRS	Comments on type of Sporting or Recreational Activity and/or Impacts of these activities
		they will also be addressed by processes at the City and County level		the vicinity of Natura 2000 sites
Landscape	Areas of high quality and vulnerable landscape	Landscape is region- wide and is fragile particularly in certain areas.	Medium in certain areas	A wide range of activities might take place in areas of high landscape quality. While many of these will be low impact the cumulative effect could be significant.
Soil	Brownfield development land	Significant brownfield redevelopment land exists in Limerick City and Shannon Industrial Zone	Medium	Significant sports and recreation development is possible within the brownfield land particularly in Limerick City
	Other land zoned for development	Land with theoretical development potential is a widespread resource within the region	Medium	There is a significant number of sports and recreation related developments that might take place within the zoned land of the region
	Land at risk from flooding	This land is widespread throughout the region and has implications for strategic decisions	High	Water related developments; riverside and lakeside activities such as trails
Human Health	Drinking Water Quality	See above		
	Bathing Water Quality	See above		
	Road and transport safety	This is an issue that is spread throughout and across the region. It is a factor that emerges from a combination of traffic volumes and road quality as well as other less infrastructural questions	High	Roads and transport issues are not specifically part of sports and recreation with the exception of road racing and cycling. However, the traffic implications of larger scale sports and recreation developments can be significant.

Resource / Factor / Receptor	Unit	Nature, scale, fragility	Relevance to LCSPRS	Comments on type of Sporting or Recreational Activity and/or Impacts of these activities
Population				
	Pleasant living working and recreational environment	A pleasant living and working environment is a matter that is relevant across the region	High	All sporting and recreational developments of a significant nature

List of environmental protection objectives, established at international, EU or national level, which are relevant to the plan and describe how those objectives and any environmental considerations have been taken into account when preparing the plan

The environmental protection objectives for this strategy are based on the key environmental issues listed in Table 1.1 which in turn relate to environmental protection policies and strategies established at EU or national level. These include the Water Framework Directive, the Habitats Directive, Planning and Development Legislation and the European Landscape Convention. Again it is emphasised that these issues must be considered in a high-level strategic context. The environmental protection objectives are 10 in total, and are as follows —

- W1. The maintenance and improvement of surface water quality
- W2. The maintenance and improvement of ground water quality
- W3. The maintenance and improvement of drinking water quality
- W4. The maintenance and improvement of bathing water quality
- F1. The appropriate management of flood risk, the reduction of the risk to development arising from flooding and the making of provision for flood plains
- G1. The reduction in the generation of greenhouse gases through the process of management of development location, maximising the use of public transport and minimising traffic
- E1. The protection of SACs and SPAs in the context of the potential impact of sporting and recreational developments
- E2. The protection and improvement of other habitats
- P1. The protection of sites of the Freshwater Pearl Mussel that do not lie within the region but that may be impacted on by activities within the region
- L1. The maintenance and enhancement of landscape quality both within and outside the region
- Q1. The enhancement of quality of life for the population in the context of better sporting and recreational facilities

#### Describe the likely significant effects on the environment (biodiversity, human health, fauna, etc.)

The Environmental Report examines the likely significant effects on the 11 environmental protection objectives of 28 strategic policies contained in the strategy. Table 1.2 summarises the likely significant environmental effects of these objectives, by presenting totals for the number of objectives that:

 Have impacts which would likely be positive or consistent with the environmental protection objectives contingent upon certain mitigations being adopted or certain conditions being

- imposed in the Strategy. This is the "Positive or Negative if conditioned" column in the table. An objective was counted under this column if it had at least one contingent score under any of the environmental protection objectives;
- Have impacts which are likely to be positive or consistent with the environmental protection objectives. An objective was counted under this column if it has primarily positive impacts with the remaining scores neutral;
- Have impacts which are likely to be neutral or insignificant. An objective was counted under this column if it had neutral or mainly neutral with some positive impacts;
- Have impacts which are likely to be negative. A predominance of negatives was the criterion for counting under this column.

Table 1.2: Summary of likely significant environmental effects of LCSPRS policies

Strategic Policy	Positive or Neutral if conditioned	Positive	Neutral	Negative	Not evaluated	Total
1,2,3,4,5,6,7,8,10,15,17,19,20,23,29,30,32,34,35	Х					19
9,11,12,13,14,16,18,21,22,24,25,26,27,28,31,33		Х				16
None			Х			0
None				Х		0
None					Х	0

It can be noted that none of the LCSPRS objectives assessed are considered likely to have a significant negative effect on the environment. It must be remembered that the process of undertaking the SEA ran in parallel to the development of the strategy. Therefore potential negative impacts of interim policies could be identified during the drafting process, and the objective conditioned to remove the potential negative impact.

A number of matters are of importance given the contingent nature of the policies that are contained in the strategy. The nature of the impacts that might arise from the implementation of these strategy policies could be significant. However, many of these impacts would be local in nature and would be addressed by other processes dealing with specific project proposals.

Some of the key impacts that would be likely to arise and that are strategic in nature relate to water quality, particularly in the context of the quality of the receiving waters for the treated wastewater of substantially increased populations using sports and recreation facilities; the impact on landscape from uncoordinated management of sport and recreation developments in sensitive areas; the impact on SACs and SPAs of sport and recreation developments and activities within them or in their

vicinity; and the impact on flood risk management in the event of uncoordinated approaches to this issue. Within rural areas there is concern regarding the impact on groundwater of low quality individual treatment systems provided in association with sports and recreation facilities.

There are a number of potential cumulative impacts that are of concern. These, in particular, relate to the impact on water quality of receiving waters of effluent arising from population increase, enterprise/industrial development, commercial development and sports and recreation and development activities taken together. The same issue of cumulative impacts applies to groundwater in rural areas in particular. A third area of concern regarding cumulative impacts relates to the impacts of a number of similar developments within or in proximity to SACs and SPAs. These developments could give rise to habitat damage and compromise the sites. These issues have been addressed in the conditions for policy acceptance and incorporated into the Strategy.

While specific projects or activities may give rise to short-term effects, such matters are best addressed through other processes at Development Plan or project level. The effects identified and addressed through this SEA process are longer-term effects that fall to be addressed by high-level, strategic processes such as the LCSPRS.

The impacts identified within the Environmental Report are dependent on the conditions regarding any actions arising from the strategy being implemented. These conditions are as follows –

- 1. The major centres identified for sport and recreation growth have or will require wastewater treatment systems that discharge to river systems. Many of these systems contain Natura 2000 Sites that would be vulnerable to inadequately treated waste-water discharges. Therefore, policies for the development of sport and recreation in such areas must be contingent on the provision of waste-water treatment systems with a capacity to produce waste water discharges of a standard that will not impact negatively on downstream Natura 2000 Sites. Where a development cannot be shown not to have a negative impact even with mitigation measures being adopted, then the development cannot be permitted except in the very unusual circumstances of an Imperative Reason of Overriding Public Interest being involved;
- 2. In addition to the impact from waste-water sport and recreation developments may have other negative implications for Natura 2000 Sites. These implications may be related to the physical destruction of a habitat, the impact of air emissions, the impact of traffic, noise and other general activities and light pollution. No sport and recreation policy shall be adopted or development permitted unless it can be demonstrated through the carrying out of an EHDA that the development will not impact negatively on a Natura 2000 Site or that where such an impact is likely it can be mitigated satisfactorily. Where a development cannot be shown not to have a negative impact even with mitigation measures being adopted, then the development cannot be permitted except in the very unusual circumstances of an Imperative Reason of Overriding Public Interest being involved;
- 3. Developments associated with rural sport and recreation may have implications for Natura 2000 Sites either because of the activity, footfall and general habitat disturbance associated with their development or due to ancillary services such as water abstraction, waste-water discharge or traffic associated with them. In the case of Natura 2000 Sites no permission

should be granted for any specific development unless and until an adequate assessment, including, where necessary an Extended HDA has been carried out and such assessment has concluded that the policy or project will have no detrimental impact on the site in question or that adequate mitigating measures are possible. Where a development cannot be shown not to have a negative impact even with mitigation measures being adopted, then the development cannot be permitted except in the very unusual circumstances of an Imperative Reason of Overriding Public Interest being involved;

- 4. Even where Natura 2000 Sites are not impacted on, any development of sport and recreation should be contingent on the effluent arising from it being such that it will not impact on any waste-water treatment system whether private or public, that will prevent that system discharging a final effluent that meets the requirements of the appropriate River Basin District Management Plans;
- 5. Even where Natura 2000 Sites are not impacted on, any development or activity associated with sport and recreation, should be contingent upon its not impacting negatively on the natural environment, as defined in Section 3.1.3 above, and no such development or activity should be permitted until it has been demonstrated that such is the case or that mitigation measures adequate to address the impacts can be implemented;
- 6. Rural sport and recreation developments may be proposed in areas without a piped waste-water collection and treatment system and this has implications for the quality of groundwater in the region. The RBD analyses have identified areas within the region where the quality of the ground-water is not adequate. Any development that requires the provision of a private treatment system should be considered in the context of the following:
  - The quality of the groundwater into which the effluent will discharge and the need to preserve or improve that quality;
  - The quality of the effluent proposed to be discharged from the waste-water treatment process;
  - The quantity of the effluent proposed to be discharged;
  - The capacity of the ground to enhance the quality of the final effluent;
  - Proposals for the management and maintenance of the treatment system;
  - The capacity of the Local Authority to monitor the quality of the discharge.

No development should take place until it has been demonstrated that the quality of the groundwater will not be impaired as a result of the development.

7. Areas that contain or are designated as Natura 2000 sites are also liable to exhibit some of the technical characteristics that would facilitate the development of high-quality facilities particularly associated with activities such as cycling, walking, hiking or mountain-biking. No policies should be adopted or permission granted for developments liable to impact on a Natura 2000 Site unless and until an Extended HDA has concluded that the proposed development would not have a negative impact on such a site or that mitigation measures which would eliminate such impacts can be identified and applied.

8. As noted above, in implementing this strategy, full regard must be had to the requirements of the Habitats Directive including the carrying out of an assessment of the implications for any Natura 2000 Site that might be at risk from any proposed development. While all Natura 2000 Sites are of key importance, a number have particular importance as they contain species that are of particular relevance as indicators of environmental quality;

A key species in this regard is the Fresh Water Pearl Mussel and particular care must be taken that activities do not pose a threat to species such as this, whether they lie within or without the area of the strategy. Where such an impact is identified the development must be mitigated or, where that is not possible must not be implemented unless the procedure relating to developments of Overriding National Importance has been completed.

This consideration applies to developments in the following areas –

- Those that involve discharges to the Cloon River;
- Those that involve discharge to the Blackwater River or its tributaries;
- In considering the management of flood risk regard should be to current flooding risks and the impact of climate change on existing defences and on the flood risk of any proposed development;
- 10. In addition, in considering the impact of any proposed policy or project that is liable to give rise to a waste-water treatment demand, the likely cumulative impact of such demands that are liable to arise from any source and no policy shall be adopted or development permitted that would result in the capacity of the area's waste water treatment system to be exceeded by the cumulative demands of successive developments;
- 11. Finally, in considering the impact of any proposed policy or project that is liable to give rise to impacts on a Natura 2000 Site, the likely cumulative effect of such impacts that are liable to arise from any source shall be considered and no policy shall be adopted or development permitted that would result in the deterioration of the site's habitat status either by itself or cumulatively with other developments or activities.

Give an outline of the reasons for selecting the alternatives considered, and a description of how the assessment was undertaken (including any difficulties)

Because of the high-level and strategic nature of the LCSPRS and the resultant basis on which the SEA was prepared, the consideration of alternatives relates to high level issues only.

In light of the nature and structure of the region, these are the options that might theoretically be pursued:

- 1. To concentrate all facilities in areas of highest population density but to allow for the provision of those facilities that require natural resources in the areas where the most appropriate of such resources exist
- 2. To allow for a wide dispersal of all facilities including those that require a high population to sustain them and all others
- 3. To concentrate large-scale built facilities in areas of greatest population densities and to provide those facilities that require natural resources in the areas where the most appropriate of such resources exist but to also provide sub-regional multi-sport centres in smaller settlements which will serve smaller and more isolated hinterlands

Each of these approaches has its costs and benefits. The more concentrated approach makes best use of infrastructure such as public transport and enables environmental impacts to be more easily managed; it also makes it more likely that those facilities that require substantial populations to be viable can be accessed to an appropriate size of population. However such an approach limits access to the more isolated populations and makes access to certain sports and recreation facilities more difficult. It must also be borne in mind, however, that while more rural populations may have more limited access to built and specialised facilities, they may well have better access to the natural amenities which are necessary for many sports and recreation activities.

The approach that allows a wide dispersal of facilities is positive in terms of accessibility but it is negative under the various headings of viability, cost, environmental impact, management of resources and so on.

The third option which seeks to balance the provision of major built facilities close to the major centres of population while providing a smaller but still significant sub-regional level of facilities at some key points throughout the region has many of the benefits and less of the dis-benefits of either of the other two approaches. This also has the advantage of reflecting the approach that has been taken in the Regional Planning Guidelines and would benefit from the provision of services and infrastructure that might arise from that document.

In adopting this option, it was considered that, provided the various policies included in the strategy are adopted and provided the conditions associated with various policies and projects are complied with, the environmental objectives can be achieved while providing a reasonable level of sports and recreation development in all parts of the region.

#### **Proposed Monitoring Measures**

The monitoring measures proposed will address some key parameters under each of the Environmental Objectives identified. As far as possible the measures will use data that is gathered for other purposes. The monitoring measures relate to the quality of water in various contexts – surface water; underground water; drinking water and bathing water. They also include measures that assess progress in the management of flood risk; the protection of Natura 2000 sites which are sites key to environmental protection; and the Freshwater Pearl Mussel which is a species that is a very good indicator of water quality as well as being a rare and vulnerable species in its own right.

The maintenance of landscape quality will also be monitored as will the environmental impacts on human health and quality of life.

Generally the targets to be sought for are those that reflect the minimum standards for the indicator with an expected improvement beyond the minimum standard.

#### **Habitats Directive Screening**

In circumstances in which it is possible that a plan or programme might impact negatively on a Natura 2000 site it is necessary to carry out an assessment as to the nature of that impact and to ascertain whether mitigation measures are possible. If such measures are not possible strategies which would result in damage to a Natura 2000 site are presumed not to be acceptable other than in exceptional circumstances.

A number of potential impacts on Natura 2000 sites have been identified that could arise from actions that would be taken in the context of the LCSPRS if adequate mitigation measures were not taken. In order to ensure that appropriate protection is given to the Natura 2000 sites, certain policies and projects in the LCSPRS has been made conditional on adequate evaluations and mitigations being carried out at project level to ensure that these priority habitats are not damaged.

These conditions have been incorporated into the LCSPRS and are denoted in the LCSPRS as having arisen from the SEA or HDA screening process.

The screening exercise did not identify any developments proposed within the Sports and Physical Recreation Strategy where areas or sites were specified to an extent that would permit or require a detailed assessment of the impact on any Natura 2000 site. Such assessments, where necessary, should be carried out when a specific project is being considered.